

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELLE LALLI,

Plaintiff,

-v-

WARNER BROS. DISCOVERY, INC.;
WARNER MEDIA, LLC U.S. SEVERANCE
PLAN,

Defendants.

Civil Action No. 1:24-cv-03178-LJL

**DEFENDANTS' NOTICE OF
MOTION FOR DECLARATORY
JUDGMENT**

PLEASE TAKE NOTICE that on a date and time to be set by the Court, counsel may be heard, Defendants Warner Bros. Discovery, Inc. and Warner Media, LLC U.S. Severance Plan (“Defendants”), by and through their attorneys, Littler Mendelson, P.C., shall move before the United States District Court for the Southern District of New York, for an Order, pursuant to Fed. R. Civ. P. 57 and 28 U.S.C. § 2201 to request a declaratory judgment and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, at the aforesaid time and place, Defendants will rely upon the accompanying Memorandum of Law Support of Motion for Declaratory Judgment, and the exhibit attached thereto, all of which are being filed and served simultaneously herewith, and all other pleadings and matters of record filed in this case.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendants do not request oral argument.

Dated: November 25, 2024
New York, New York

LITTLER MENDELSON, P.C.

By: /s/ William J. Anthony

William J. Anthony
wanthony@littler.com
900 Third Avenue
New York, NY 10022.3298
Telephone: 212.583.9600
Facsimile: 212.832.2719

Leslie A. Dent (*pro hac vice*)
ldent@littler.com
LITTLER MENDELSON, P.C.
3424 Peachtree Road N.E.
Suite 1200
Atlanta, GA 30326.1127
Telephone: 404.233.0330
Facsimile: 404.233.2361

Attorneys for Defendant